Remarks/Arguments

Claims 1, 7, 8, 9, 12, 15, 16, 17, 18, 20, 22, 24, 26, 28, 29 and 33 have been amended. The Examiner has rejected applicant's claims 1-6, 11-15, 20-21, 25 and 29-34 under 35 U.S.C. §103(a) as being unpatentable over the Takemoto, et al. (US 5,065,246) patent in view of the Kuba, et al. (US 5,806,072) patent and further in view of the Lee, et al. (US 5,126,832) patent. The Examiner has also rejected applicant's claims 7-8, 17, 22-24 and 27-28 under 35 U.S.C. §103(a) as being unpatentable over the Takemoto, et al. patent in view of the Kuba, et al. patent, the Lee, et al. patent (US 5,126,832) and further in view of the Jeong (US 6,130,988) patent. The Examiner has rejected applicant's claims 9-10 and 18-19 under 35 U.S.C. §103(a) as being unpatentable over the Takemoto, et al. patent, in view of the Kuba, et al. patent, the Lee, et al. patent, the Jeong patent and in further view of the Honda (US 6,181,878) patent. Applicant's claim 16 has been rejected under 35 U.S.C. §103(a) patent as being unpatentable over the Takemoto, et al. patent, in view of the Kuba, et al. patent, the Lee,

Applicant has amended applicant's independent claims 1, 12, 20 and 29, and with respect to such claims, as amended, and their respective dependent claims, the Examiner's rejections are respectfully traversed.

More particularly, applicant's independent claims have a common feature that a common memory has connected to it inputting means for inputting a video signal, encoding, expanding, compressing or processing means for encoding, expanding, compressing or processing the video signal and generating means for generating a character signal. Control means is provided for controlling a combination operation of the character signal and, in particular, a combination operation with the video signal input by the inputting means or the

et al. patent and the Abe, et al. (US 5,515,174) patent.

expanded video signal from the expanding means. The common memory stores the video signal from the inputting means, the encoded, expanded, compressed or processed signal from the encoding, expanding, compressing or processing means, and a predetermined table value corresponding to the character signal generated by the generating means according to a control signal from a control means so that the encoding, expanding, compressing or processing means and the combination operation of the character signal are performed with using the memory.

Such constructions are not taught or suggested by the cited art of record. The Takemoto, et al. patent discloses a system in which an image pickup 35 is connected to a signal processing device 39 whose luminance signal and color difference signal outputs are connected to A/D converters 40 and 44, respectively. The digital luminance signal and color difference signals are passed via a memory controller 41 in page format to the page memories 42 and 45. The signals from these memories are compressed in compress/expand circuits 47 and 48 and the compressed outputs are lead by a switch to a memory 33. Character signals from a character generator 57 are also passed via memory control 33 and the page memories to the memory 33. A system controller 46 controls driving of the image pickup, the character generator and the memory controller.

In the Takemoto, et al. patent, therefore, only the <u>compress/expand circuits 47 and 48</u> are <u>connected to the memory 33</u> through the switch 18. Moreover, the <u>character signals</u> are <u>generated by the generator 57 itself</u> and the character signals then passed by the page memories to the memory 33. Accordingly, in the Takemoto, et al. patent, only the character signals and the <u>compressed luminance signals in page format</u> are stored in the memory 33.

The memory 33 in the Takemoto, et al. patent, therefore, simply does not equate to

applicant's claimed common memory. Applicant's claimed common memory has connected to it inputting means for inputting a video signal or compressed video signal, encoding, expanding, compressing or processing means for encoding, expanding, compressing or processing the video signal and generating means for generating a character signal. As abovenoted, the memory 33 in the Takemoto, et al. patent has only the compress/expand circuits 47, 48 connected to it through the switch 18. Moreover, there is no basis for the Examiner's argument that the character generator 57 is connected to the memory 33, and, in any case, it is quite clear that the image pickup 35 is not connected to such memory.

Additionally, in the Takemoto, et al. patent, it is the character generator 57 which generates the character signals and the memory 33 only stores these signals and does not participate in their generation. Also, neither the image pickup output nor the expanded signals are supplied to the memory 33, and the expanding and compressing is performed by the compress/expand circuits 47, 48, and not with using the memory 33. Finally, there is no combining operation in the Takemoto, et al. patent of the character signals with the image signal from the image pickup 35 or the expanded video signals from the compress/expand circuits 47, 48.

The Takemoto, et al. patent thus fails to teach or suggest the common memory recited in applicant's claims in which the common memory has connected to it inputting means for inputting a video signal or compressed video signal, encoding, expanding, compressing or processing means for encoding, expanding, processing or expanding the video signal and generating means for generating a character signal, and in which the common memory stores the video signal from the inputting means, the encoded, expanded, compressed or processed signal from the encoding, expanding, compressing or processing means, and a predetermined

table value corresponding to the character signal generated by the generating means according to a control signal from the control means so that the encoding, expanding, compressing or processing and the combination operation of the character signal are performed with using the memory.

The cited Kuba, et al. patent and the cited Lee, et al. patent fail to make up for the deficiencies in the Takemoto, et al. patent. The Kuba, et al. patent merely teaches a compression circuit which uses an auxiliary memory and the Lee, et al. patent the adding of a video signal with a character signal and the selecting with a logic circuit complementary colors for the character signal. However, neither of these patents teaches or suggests a common memory which has connected to it inputting means for inputting a video signal or compressed video signal, encoding, expanding, compressing or processing means for encoding, expanding, processing or expanding the video signal and generating means for generating a character signal, and in which the common memory stores the video signal from the inputting means, the encoded, expanded, compressed or processed signal from the encoding, expanding, compressing or processing means, and a predetermined table value corresponding to the character signal generated by the generating means according to a control signal from the control means so that the encoding, expanding, compressing or processing and the combination operation of the character signal are performed with using the memory. Applicant's claims thus patentably distinguish over the combination of the Takemoto, et al., Kuba, et al. and Lee, et al. patents.

In view of the above, it is submitted that applicant's claims, as amended, patentably distinguish over the cited art of record. Accordingly, reconsideration of the claims is respectfully requested.

Dated: July 20, 2004

Robin, Blecker & Daley 330 Madison Avenue New York, NY 10017 (212) 682-9640 Respectfully submitted,

ohn J. Forrente

Attorney for Applicant